



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**JUL 06 2009**

REPLY TO THE ATTENTION OF:  
**E-19J**

Nancy S. Larson, District Ranger  
LaCroix Ranger District  
Superior National Forest  
320 Highway 53 N  
Cook, Minnesota 55723

Re: Border Project Draft Environmental Impact Statement, LaCroix Ranger District,  
Superior National Forest, St. Louis County, Minnesota

Dear Ms. Larson:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the above-mentioned project. Our review is pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The purpose of the proposed activities is to maintain and promote diverse, native vegetation communities by moving the vegetation component toward landscape ecosystem objectives described in the 2004 Superior National Forest Land and Resource Management Plan (Forest Plan). Proposed management activities are designed to address gaps between desired future conditions as stated in the Forest Plan and current conditions found in the project area.

Project objectives include the following:

- Restore stand conditions by reducing hazardous fuels and future risk of wildfire;
- Restore stand conditions by planting long-lived tree species and enhancing scenery and aquatic habitat;
- Use intermediate harvests to improve stand structure and within-stand species and age diversity;
- Use final harvests to create young forest stands; and
- Modify the transportation system.

The Draft EIS explains the project's purpose and need, documents analysis of potential effects, and identifies/explains the significant issue raised during scoping. Development of the proposed action was a collaborative effort with the State of Minnesota, St. Louis County, Tribal representatives, Voyageurs National Park, and private landowners. This collaborative effort was intended to design similar forest management and to coordinate other activities that would occur across ownership boundaries.

The Draft EIS documents the analysis of three alternatives and the selection of Alternative 3 as the Preferred Alternative. Alternative 3 was developed to address the significant issue identified during the public scoping phase – potential social and resource effects to areas of concern mentioned by the public (e.g., near the Boundary Waters Canoe Area Wilderness, Voyageurs National Park, and Vermilion and Echo Rivers). Alternative 3 includes a buffer greater than one mile between proposed management activities and sensitive areas. The Border Project effects analysis discloses the effects of the proposed project on vegetation and how each alternative would contribute toward meeting Forest Plan objectives.

Development of alternatives included avoidance of potentially-adverse environmental effects; however, some adverse effects to the environment may occur. Impacts will be further mitigated by a high percentage of winter harvest and winter access routes, Forest Plan and site-specific operational standards and guidelines, Minnesota Forest Resource Council Voluntary Site-level Forest Management Guidelines, and monitoring activities identified in the Appendices to the Draft EIS.

Based upon our review of the Draft EIS and discussions between Kathy Kowal of my staff and yourself, we have assigned a rating of "Lack of Objections" to this Draft EIS. A summary of the rating system used in the evaluation of these documents is enclosed for your reference. We have no substantive comments on the preferred action; the Preferred Alternative addresses the significant issue raised during scoping and is consistent with the Forest Plan.

Please send one copy of the Final EIS and Record of Decision to my attention once it becomes available. Should you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathy Kowal of my staff at (312) 353-5206 or via email at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,



Kenneth A. Westlake  
Supervisor, NEPA Implementation  
Office of Enforcement and Compliance Assurance

Enclosure

cc: Jim McDonald, Regional Environmental Coordinator